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Attorneys for Defendants ALM Media, LLC, William L. Pollak and Karen Sloan

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

SHERRIE RUSSELL-BROWN,

Plaintiff,

v.

THE UNIVERSITY OF FLORIDA, BOARD
OF TRUSTEES, et al

Defendants.

Civil Action No. 2:10-cv-04017-SDW-MCA

**NOTICE OF MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

To: Lennox S. Hinds, Esq.
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Attorneys for Plaintiff Sherrie Russell-Brown

Walter Saurack, Esq.
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*Attorneys for Defendants The University of Oxford and
Oxford University Development, North America, Inc.*

PLEASE TAKE NOTICE that the undersigned, attorneys for defendants ALM Media, LLC, William L. Pollack and Karen Sloan, will move before the Honorable Susan

D. Wigenton, United States District Court Judge, District of New Jersey, at the Martin Luther King, Jr. Federal Building & Courthouse, Room 5060, 50 Walnut Street, Newark, N.J. 07102 on a date to be assigned by the Court, for an Order, in the form of the proposed order enclosed herewith, dismissing this action in the entirety and with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6), on the ground that the First Amended Complaint of Plaintiff Sherrie Russell-Brown fails to state a claim upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, defendants ALM Media, LLC, William L. Pollack and Karen Sloan shall rely on the Memorandum of Law in Support of Media Defendants' Motion to Dismiss, filed herewith, as well as the Declaration of Fabio Bertoni, with exhibits,

PLEASE TAKE FURTHER NOTICE that a proposed form of order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument in this matter.

Respectfully submitted,

McCUSKER, ANSELM, ROSEN
& CARVELLI
A Professional Corporation
210 Park Avenue, Suite 301
Florham Park, N.J. 07932
Attorneys for Defendants
ALM Media, LLC, William L.
Pollack and Karen Sloan

By: /s/ Bruce S. Rosen
Bruce S. Rosen

Dated: November 15, 2010